

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HOLLY YENCHA, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

ZeoBIT LLC, a California limited liability
company,

Defendant.

Case No. 2:14-cv-00578-JFC

JOINT MOTION TO EXTEND TIME FOR ENE

Plaintiff Holly Yencha (“Yencha” or “Plaintiff”) and Defendant ZeoBIT, LLC (“ZeoBIT” or “Defendant”), by and through their undersigned counsel and pursuant to Section 4.5 of the Western District of Pennsylvania’s ADR Policies and Procedures, jointly move the Court to enter an Order extending the Parties’ deadline to complete their early neutral evaluation (“ENE”) conference. In support of the instant motion, the Parties state as follows:

1. Pursuant to Section 4.4(B) of the Western District of Pennsylvania’s ADR Policies and Procedures, the Parties’ deadline to hold an ENE is November 28, 2014.

2. The Court has appointed the Honorable Edward A. Infante (ret.) of JAMS as the early neutral evaluator. However, due to Judge Infante’s and the Parties’ respective schedules, the parties will be unable to complete the ENE prior to the current November 28, 2014 deadline. The earliest available dates for the ENE are in January 2015.

3. Accordingly, the Parties jointly and respectfully request that the Court extend the deadline for them to complete the ENE with Judge Infante until January 15, 2015.

4. Notwithstanding the requested extension of the ENE deadline, the Parties are

otherwise diligently proceeding pursuant to the schedule of discovery and general case deadlines set forth in the Court's September 30, 2014 Order. (Dkt. 15.)

5. Based on the foregoing, good cause exists to grant the instant motion and the relief requested herein is not sought for any improper purpose.

WHEREFORE, Plaintiff Holly Yencha and Defendant ZeoBIT, LLC respectfully request that the Court enter an Order extending their deadline to complete their ENE conference until January 15, 2015.

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Respectfully submitted,

HOLLY YENCHA, individually and on behalf of
all others similarly situated,

Dated: November 13, 2014

By: /s/ Courtney C. Booth
One of Plaintiff's Attorneys

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**Pro hac vice* admission to be sought.

ZeoBIT LLC,

Dated: November 13, 2014

By: /s/ Matthew D. Brown
One of Defendant's Attorneys

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**CONSENT PURSUANT TO ELECTRONIC CASE FILING
POLICIES AND PROCEDURES, SECTION 11**

I, Courtney C. Booth, attest that consent in the filing of the *Joint Motion to Extend Time for ENE* has been obtained from each of the other signatories.

Executed on November 13, 2014, in Chicago, Illinois.

/s/ Courtney C. Booth

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2014, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Courtney C. Booth_____